

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

**AMAZON.COM, INC. and AMAZON DATA
SERVICES, INC.,**

Plaintiffs,

v.

**WDC HOLDINGS LLC dba NORTHSTAR
COMMERCIAL PARTNERS; BRIAN
WATSON; STERLING NCP FF, LLC;
MANASSAS NCP FF, LLC; NSIPI
ADMINISTRATIVE MANAGER; NOVA WPC
LLC; WHITE PEAKS CAPITAL LLC;
VILLANOVA TRUST; CARLETON NELSON;
CASEY KIRSCHNER; ALLCORE
DEVELOPMENT LLC; FINBRIT HOLDINGS
LLC; CHESHIRE VENTURES LLC; JOHN
DOES 1-20,**

Defendants.

Case No. 1:20-CV-484

**Hon. Liam O’Grady
Hon. Theresa Buchanan**

**DEFENDANTS CARLETON NELSON AND CHESHIRE VENTURES, LLC’S
MOTION TO PARTICIPATE REMOTELY OR, IN THE ALTERNATIVE,
TO BE EXCUSED FROM APPEARING**

COME NOW Defendants Carleton Nelson and Cheshire Ventures, LLC (collectively, “Defendants”), through undersigned counsel, and respectfully move this Court to allow Defendants’ counsel to participate remotely in the hearing set on Defendants Brian Watson and WDC Holdings LLC’s Motion for Rule 16 Conference, which is currently scheduled (per Dkt. 400) to be heard on Friday, November 12, at 10:00 a.m. In support, Defendants state as follows:

1. Local counsel for Defendants, Rachel Friedman, is pregnant, and her due date is the same week as the scheduled hearing. She currently resides and works from Birmingham, Alabama, and her doctors have advised her against any travel so close to her due date.

2. Lead counsel for Defendants, Alex Little, is scheduled to be out of state in Illinois on previously planned travel on the same day as the scheduled hearing.

3. Both counsel can be available for the hearing via telephone or videoconference, if the Court so permits, according to the Court's preference. Further, because Defendants have not taken any position on the motion, Defendants also waive their right to be present at the hearing if the Court prefers to excuse their attendance.

Counsel for Defendants have contacted the moving Defendants and the Plaintiffs about this motion, and the moving Defendants do not oppose their request. At the time of filing, Plaintiffs have not informed undersigned counsel of their position.

WHEREFORE, for the reasons stated above, the Defendants respectfully request that their motion to participate remotely be GRANTED or, in the alternative, that the Court excuse their appearance.

Respectfully submitted,

BURR & FORMAN LLP

/s/ Rachel Friedman

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/s/ J. Alex Little

J. Alex Little, IV (TN BPR No. #29858)
(*pro hac vice*)
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Attorneys for Nelson and Cheshire Ventures

CERTIFICATE OF SERVICE

I hereby certify that on November 4, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to all counsel of record.

In addition, a true and correct copy has been served upon the following, via U.S. First Class Mail, postage pre-paid:

Casey Kirschner
635 N. Alvarado Lane
Plymouth, MN 55447

Defendant Pro Se

/s/ Rachel Friedman
Rachel Friedman